

REMARKS

In response to the Office Action dated March 19, 2007, applicant has amended claim 70. Thus, claims 44 – 70 remain pending in the application. Reconsideration of the claims, as amended, is respectfully requested.

Claim 70 was rejected under 35 U.S.C. section 112 first paragraph as failing to comply with the written description requirement. Specifically, the Official Action indicated that the specification did not disclose the server saving the received information and did not disclose an end character. With respect to the server saving the received information, claim 70 has been amended to remove the reference to saving. With respect to the comments about the specification not disclosing an end character, applicant respectfully submits that claim 70 does not recite an end character. Claim 70 has been amended to recite sending stored elements to the server if the selection comprises a code indicating the end of input. Applicant respectfully submits that this limitation is not disclosed by the art of record and is sufficiently described within the specification. A Notice of Allowance for claim 70, and all claims dependent therefrom, is respectfully requested.

Claim 65 through 70 were rejected under 35 U.S.C section 102(c) as being anticipated by Jalili. Claim 70 has been amended to more particularly recite the step of “sending storage selections to the server if the selection comprises a code indicating the end of input.” Applicant respectfully submits that the Jalili reference does not describe sending selections to the server if the selection comprises a code indicating an end of input. The disclosure in Jalili of sending coordinates to the server is based upon receiving a password of a known length and is not based upon recognizing a selection comprising a code indicating an end of input. There is no description in Jalili of the ability to recognize a code indicating an end of input. Therefore, the applicant respectfully submits that claim 70, and all claims dependent therefrom, are distinguishable from the art of record and a Notice of Allowance is respectfully requested.

Claim 65 was rejected as being anticipated by Jalili. Applicant has previously argued that the Jalili reference does not describe the step of receiving, after each selection of multiple points in a graphical image, coordinates associated with a portion of a security code and processing the coordinates received after each selection. Applicant will further address whether or not Jalili teaches these limitations with respect to their discussion of the rejection of the remaining claims.

Claims 44 – 64 were rejected under 35 U.S.C. section 103(a) as being unpatentable over Jalili in view of Mizoguchi. Applicant has previously argued with respect to these claims that neither Jalili nor Mizoguchi teach the step of “transmitting, after each selection of each of the multiple points in the graphical user image, coordinates associated with a portion of the security code from the client to the server over the connection, the coordinates further associated with each selection of such point.” Applicant thanks the examiner for the courtesy extended during the telephone interview of April 3, 2007. The examiner indicated in the telephone interview of April 3rd that the transmission of individual coordinates associated with a portion of the password are taught in part by the reference in Figure 8 to the receiving of inputs corresponding to desired icons wherein icons is plural (Step 806, Figure 8) and that the generated selected icon information is transmitted to the server for comparison with stored icon location information wherein the use of icon is singular (Steps 808 and 810 of Figure 8). Furthermore, the examiner referenced Figure 9, which illustrates generated icons 906 wherein icons is plural and icon location information 940 wherein icon is singular. Thus, the examiners position is that the singular use of icon within icon location information indicates that singular sets of coordinates with respect to selected icons are transmitted from the client to the server rather than transmitting a group of selected icons as is the position of the Applicant.

Applicant respectfully directs the examiners attention to a number of references within the specification of the Jalili reference which indicate that the reference to “icon location information” does not reference a single set of coordinates associated with a selected icon but in fact describes multiple sets of coordinates with respect to multiple icons.

Initially, applicant notes a reference beginning at line 1, column 8.

In order to use enter the user's password or other data in accordance with the present invention, the appropriate icons 101N 230 correspondings to the elements of the password are selected in order by the user, and this location information is communicated to the server system 200.

This reference describes the selection of multiple elements of the password and then describes this group of selected information as location information. While the use of icon is not described in this section, it illustrates that location information references multiple elements of a password and not merely a single element.

Another portion of the specification using location information to describe multiple elements begins at column 8, line 55.

With the user's pin of "5263" the user would point to and click first the cross, then the circle, then the right triangle and then the square. This will act to select a point in each icon 230 in the form of location information. This location information is then transmitted or communicated to the server in the form, for example, of particular points in the Icon 230 such as those listed in Session List 212 in Figure 7.

Thus again, the transmission of multiple points associated with multiple selected icons, i.e., cross, circle, right triangle and square are described as location information which is transmitted to the server. Again, location information describes multiple not singular elements. Thus, Jalili is describing with respect to location information the transmission of multiple coordinates associated with multiple selected icons.

Finally, column 9, lines 23 – 25 of the Jalili reference describes, “The client subsystem then generates selected icon location information in response to said selection of icons by the user in step 808.” This describes that icon location information is generated in the response to the selection of icons (plural). Thus, a selection of an assortment of multiple coordinates with the terms “icon location information” or “location information” seems to be appropriate in view of the disclosure in Jalili. Jalili does not clearly disclose separately transmitting coordinates after their selection.

Applicant further notes, as recognized in the Official Action, that Jalili does not describe the reconfiguration of icons after a selection. Since Jalili maintains the association of icons in a same configuration while each icon is selected, there is no need for the transmission of icon coordinate information after each selection of an icon as described in applicant’s claims. Since Jalili only describes the use of a single group of icons from which all of the coordinates would be selected, there is no time for transmitting each selection separately from the client to the server since each selection would be made quickly on the single keypad.

Therefore, applicant respectfully submits that claims 44 and 54 are distinguishable from the combination of Jalili and Mizoguchi and claims 65 is distinguishable from Jalili since Jalili does not describe separate transmissions of coordinates associated with a selected icon after each selection of said coordinates, but instead describes a transmission of all of the coordinates together after selection of multiple icons. Therefore, applicant respectfully submits that all remaining claims are allowable over Jalili alone or over the combination of the Jalili and Mizoguchi references. A Notice of Allowance is respectfully requested.

Applicant has now made an earnest attempt in order to place this case in condition for allowance. For the reasons stated above, Applicant respectfully requests full allowance of the claims as amended. Please charge any additional fees or deficiencies in fees or credit any overpayment to Deposit Account No. 20-0780/PAYT-26,276 of HOWISON & ARNOTT, L.L.P.

Respectfully submitted,
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